

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

JAMES L. WILLIAMS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action 8:16-cv-00058-PWG
)	
CORELOGIC SAFERENT, LLC,)	
)	
Defendant.)	
)	

DEFENDANT’S RESPONSE TO JULY 7, 2016 ORDER

Defendant, CoreLogic SafeRent, LLC (“SafeRent”), by counsel, hereby submits this response to the Court’s July 7, 2016 Order.

On July 7, 2016, the parties attended a pre-motion conference call with the Court to discuss SafeRent’s contemplated Motion to Dismiss and Motion to Strike the Class Allegations with respect to Count II of the Amended Complaint due to Plaintiffs’ and the class members’ lack of Article III standing, including as informed by *Spokeo, Inc. v. Robins*, 2016 U.S. LEXIS 3046 (May 16, 2016). During the conference call, the Court discussed the possibility of SafeRent reserving such arguments until after further discovery. Nonetheless, in the event that SafeRent wished to advance the Motion at this time, the Court set a briefing schedule and a deadline of July 15, 2016 for the opening brief.

Upon further consideration, SafeRent intends to raise its jurisdictional arguments regarding Plaintiffs’ lack of Article III standing and the defective nature of the class pled under Count II a later juncture in the case after further discovery has been completed. SafeRent reserves all such rights in that regard. SafeRent has also informed Plaintiffs’ counsel of this decision.

Dated: July 15, 2016

CORELOGIC SAFERENT, LLC

Respectfully submitted,

By: /s/ S. Mohsin Reza
S. Mohsin Reza (Bar No. 19015)
TROUTMAN SANDERS LLP
1850 Towers Crescent Plaza, Suite 500
Tysons Corner, Virginia 22182
Telephone: (703) 734-4334
Facsimile: (703) 734-4340
mohsin.reza@troutmansanders.com

Ronald I. Raether, Jr.*
TROUTMAN SANDERS LLP
5 Park Plaza Ste 1400
Irvine, CA 92614
Telephone: (949) 622-2722
Facsimile: (949) 622-2739
ronald.raether@troutmansanders.com

Timothy J. St. George*
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, VA 23219
Telephone: (804) 697-1254
Facsimile: (804) 698-6013
tim.stgeorge@troutmansanders.com
*admitted pro hac vice

Counsel for Defendant CoreLogic SafeRent, LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via Federal Express upon the following counsel of record, this 15th day of July 2016:

Kristi C. Kelly
Kelly & Crandall, PLC
4084 University Drive, Suite 202A
Fairfax, VA 22030
Telephone: (703) 424-7576
Facsimile: (703) 591-0167
Email: kkelly@kellyandcrandall.com

E. Michelle Drake (MN Bar No.0387366)*
John G. Albanese (MN Bar No.0395882)*
Berger & Montague, P.C.
43 SE Main Street, Suite 505
Minneapolis, MN 55414
Telephone: (612) 594-5999
emdrake@bm.net
jalbanese@bm.net

*admitted *pro hac vice*

Counsel for Plaintiffs

By:/s/ S. Mohsin Reza
S. Mohsin Reza (Bar No. 19015)
TROUTMAN SANDERS LLP
1850 Towers Crescent Plaza, Suite 500
Tysons Corner, Virginia 22182
Telephone:(703)734-4334
Facsimile: (703) 734-4340
mohsin.reza@troutmansanders.com

Counsel for CoreLogic SafeRent, LLC